

# UNITED STATES DISTRICT COURT

Mike  
Brews

SOUTHERN

DISTRICT OF

OHIO

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Gregory R. HOWARD, John A. LANOY,  
Joshua L. LEACH and Brian L. SANDERS

2:06-mj-386-TK  
2:06-mj-387-TK

CASE NUMBER:

2:06-mj-388-TK  
2:06-mj-389-TK

I, Timothy P. Burt, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 1, 2006 and continuing up to and including April 13, 2006, in the City of Columbus, Franklin County, in the Southern District of Ohio, defendant(s) did, (Track Statutory Language of Offense)

Knowingly and intentionally possess and conspire to possess with the intent to distribute cocaine base, commonly referred to as crack, a schedule II controlled substance.

in violation of Title 21 United States Code, Section(s) 841 (a) (1) and 846.

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

(see attached)

Continued on the attached sheet and made a part hereof:

☒ YES ☐ NO



Signature of Complainant

Sworn to before me and subscribed in my presence,  
09/27/2006

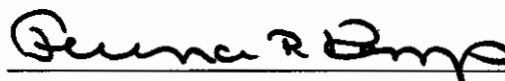
Columbus, Ohio

Date

AT

City and State

Terence P. Kemp, U.S. Magistrate Judge



Name and Title of Judicial Officer

Signature of Judicial Officer

**PROBABLE CAUSE AFFIDAVIT****Gregory R. HOWARD, John A. LANOY, Joshua L. LEACH and Brian L. SANDERS**I, **Timothy P. Burt**, being duly sworn, depose and state that:

I have been a Special Agent of the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since August 1999. As a result of my training and experience as an ATF Special Agent, I am familiar with Federal criminal laws pertaining to firearms and narcotics violations.

1. On or about November 2005, CPD Patrol Officers initiated an investigation into the illicit armed narcotics trafficking activities of Gregory R. HOWARD and his associates in and around the area of Sullivant Avenue and Green Street, Columbus, Ohio. CPD Patrol Officers had received a number of complaints concerning HOWARD and his organization and had gathered additional information through a series of arrest and Patrol related stops on individuals in and around the area. Information received from complaints and provided by suspects during arrest indicated that HOWARD was the leader of an armed drug trafficking organization operating in and around Sullivant Avenue and Green Street, Columbus, Ohio.
2. The CPD Officers interviewed residents and suspects being arrested in the area to begin their Patrol Based investigation. During the course of these interviews, the Officers obtained information indicating several male blacks and male whites were actively selling narcotics, carrying firearms and discharging firearms in the area. The residents stated that "Black Greg" (later identified as Gregory HOWARD), BJ Rooker (Brian ROOKER), "Hot Rod" (Ronald JONES) and other associates were responsible for the majority of these activities.
3. In response to the information obtained through interviews, Patrol stops and NETRMS (CPD Crime Database) crime trend analysis, Officers began to conduct increased surveillance and spot and tag operations in and around the Sullivant and Green area. During the course of these operations, Officers were able to identify and arrest a number of individuals involved in the possession of and/or illicit trafficking of narcotics and/or firearms. The information received during the initial investigation indicated that HOWARD was the ring leader of this organization and that the other individuals identified (and additional unidentified individuals) worked for HOWARD (sold illicit narcotics on his behalf).
4. Through additional analysis of NETRMS reports the Officers located CPD NETRMS report number 060169244, dated 02/24/06, related to HOWARD's most recent CPD arrest. The aforementioned report indicated that the victim of the assault stated that he / she owed the dope man (HOWARD) money, did not have the money and was assaulted for not paying the debt.
5. On or about 09/09/05 and 12/27/05 HOWARD was arrested for Drugs and CCW. During the course of these arrests, HOWARD was read his constitutional rights and agreed to waive those rights and answer questions. During the course of these interviews, HOWARD stated that he was the "dope boy selling the most, making the most money, hustling the most" and that he did not plan on stopping just because he was "arrested a few times".
6. In total, the initial investigation identified approximately eighteen (18) individuals in the area of Sullivant Avenue and Green Street, Columbus, Ohio, involved in narcotics trafficking related activity. CPD surveillance identified these individuals engaged in narcotics related activities (sales) in the area of Sullivant Avenue and Green Street, Columbus, Ohio for in excess of twelve (12) hours a day. The

Officers also reported the presence individuals engaging in counter-surveillance activities (individuals located east, west, north and south of the area utilizing Nextel or Boost telephones with direct connect capabilities alerting individuals of Police presence) in the immediate area of Sullivant Avenue and Green Street, Columbus, Ohio.

7. On February 01, 2006 CPD Patrol Officers notified CPD SRB Detective N. Hood of the aforementioned narcotics and firearms related activities in and around the Sullivant Avenue and Green Street area of Columbus, Ohio. CPD Patrol Officers informed Detective Hood that these activities centered on HOWARD and his associates.
8. CPD SRB initiated undercover (U/C) operations in and around the aforementioned area in an effort to perfect charges against HOWARD and his associates and to curtail the narcotics and firearms related activities in the targeted area. During the course of the U/C operations, CPD SRB contacted the ATF Violent Crime Impact Team (VCIT) for additional assistance and resources in targeting HOWARD and his organization. CPD and ATF launched a joint initiative targeting the armed, violent drug trafficking activities of HOWARD and his criminal associates.
9. On or about February 1, 2006, CPD SRB Detective LaRoche #1034, working in an undercover capacity (U/C), proceeded to the area of Sullivant Avenue and Green Street, Columbus, Ohio to make a direct purchase of suspected crack cocaine (known area utilized by Gregory Rasad HOWARD and his associates to traffic in illicit narcotics). Once in the area, the U/C observed a male white standing on the sidewalk just south of Sullivant Avenue and Green Street, Columbus, Ohio (later positively identified by CPD Officer M. Paul #2298 as John Allen LANOY SSAN: 297-60-3570, DOB: 07/27/77, BCI# B762021, Height: 5-6, Weight: 180, Hair: Blonde, Eyes: Blue). The U/C asked LANOY, "you got some?" (referring to crack cocaine). LANOY indicated that he did by nodding his head and the U/C stated that the U/C would pull the vehicle onto the parking lot of Sally's Market located at Sullivant Avenue and Green Street, Columbus, Ohio to complete the transaction.
10. LANOY approached the U/C vehicle and asked the U/C, "how much you want?" The U/C responded, "a teenager" (approximately \$60.00 worth of crack cocaine). LANOY then entered the U/C vehicle, sat down in the passenger seat and stated, "my nigger's coming" (referring to LANOY's supplier, later identified as Gregory HOWARD).
11. A short time later, a black male arrived at the vehicle (positively identified by CPD Officer C. Radich #2249 as Gregory Rasad HOWARD). The U/C called to HOWARD, "I need a teenager...you got a fat fifty?" HOWARD indicated that he had to properly weigh the crack cocaine and informed the U/C that he would be back shortly.
12. HOWARD eventually returned to the U/C vehicle and handed the U/C a baggie containing suspected crack cocaine. The U/C paid HOWARD fifty dollars (\$50.00) in previously recorded government funds and watched as HOWARD and LANOY then left the area on foot (during a later contact, U/C obtained HOWARD's cellular telephone number).
13. The suspected crack cocaine was transported to the CPD property room and turned in as evidence (property number: 06002916) and submitted the CPD Crime Laboratory for analysis (log: 1239-06). The suspected crack cocaine tested positive for .6 grams of cocaine, a schedule II controlled substance.
14. On or about February 21, 2006, SRB Detective LaRoche #1034, working in an undercover capacity (U/C), proceeded to the area of Sullivant Avenue and Green Street, Columbus, Ohio to make a direct



purchase of suspected crack cocaine (known area utilized by Gregory Rasad HOWARD and his associates to traffic in illicit narcotics). Once in the area, the U/C observed John Allen LANOY (U/C familiar with LANOY from 02/01/2006 narcotics transactions with LANOY and HOWARD) standing on the sidewalk north and west of Sally's Market located at Sullivant Avenue and Green Street, Columbus, Ohio.

15. U/C called out to LANOY, who directed U/C to pull U/C vehicle onto the parking lot of Sally's Market. LANOY approached the U/C vehicle and asked the U/C what the U/C needed. The U/C stated that the U/C needed a "fat fifty" (referring to \$50.00 worth of suspected crack cocaine).
16. LANOY entered the U/C vehicle on the passenger side and directed the U/C to drive him to 872 Sullivant Avenue, Columbus, Ohio (residence utilized by HOWARD and his associates to traffic in illicit narcotics). Once there, the U/C handed LANOY \$50.00 in previously recorded government funds and LANOY was observed entering 872 Sullivant Avenue, Columbus, Ohio.
17. A few minutes later LANOY exited the residence and handed the U/C a baggie containing a quantity of suspected crack cocaine. The U/C drove LANOY back to the area where he had initially made contact and LANOY exited the U/C vehicle. The U/C then left the area.
18. The suspected crack cocaine was transported to the CPD property room and turned in as evidence (property number: 06004611). The suspected crack cocaine was submitted to the CPD Crime Laboratory (log: 1893-06) and tested positive for approximately .7 grams of cocaine, a schedule II controlled substance.
19. On March 2, 2006, SRB Detective LaRoche #1034, working in an undercover capacity (U/C), proceeded to the area of Sullivant Avenue and Green Street, Columbus, Ohio to make a direct purchase of crack cocaine (known area utilized by Gregory Rasad HOWARD and his associates to traffic in illicit narcotics). Prior to traveling to the area, the U/C made contact with HOWARD via cellular telephone and discussed purchasing ¼ ounce of crack cocaine for two hundred and fifty dollars (\$250.00). HOWARD stated that he would be able to complete the deal for ¼ ounce of crack cocaine and instructed the U/C to park his vehicle on the parking lot of Sally's Market located at Sullivant Avenue and Green Street, Columbus, Ohio.
20. The U/C arrived at Sally's Market and parked the U/C vehicle. The U/C observed HOWARD exit Sally's Market and then enter the U/C vehicle from the passenger side. HOWARD then produced a large baggy of crack cocaine and the U/C weighed the suspected crack cocaine (approximately 20.7 grams packaged weight).
21. The U/C paid HOWARD \$250.00 in previously recorded government funds. HOWARD then exited the U/C vehicle and left the area on foot.
22. The suspected crack cocaine was transported to the CPD property room and turned in as evidence (property number: 06005407). The suspected crack cocaine was submitted to CPD Crime Laboratory (log: 2138-06) and proved positive for approximately 5.3 grams of cocaine base, commonly referred to as crack, a schedule II controlled substance.
23. On 09 March 2006, SRB Detective LaRoche #1034, working in an undercover capacity (U/C) proceeded to the area of 667 Sullivant Avenue to make a direct purchase of crack cocaine (known area utilized by Gregory Rasad HOWARD and his associates to traffic in illicit narcotics). Prior to traveling to the

target area, the U/C made contact with HOWARD via cellular telephone and discussed purchasing 1/2 ounce of crack cocaine for \$500.00. HOWARD stated that he would be able to complete the deal for 1/2 ounce of crack cocaine and instructed the U/C to park on the parking lot of Dodge Recreation Center located at 667 Sullivant Avenue, Columbus, Ohio (in the vicinity of Sullivant and Green, Columbus, Ohio).

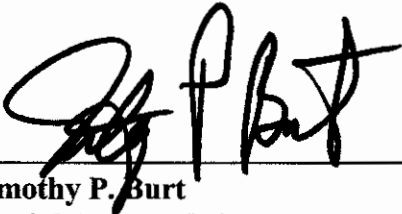
24. The U/C arrived at 667 Sullivant Avenue and parked the U/C vehicle. While waiting for HOWARD to arrive, the U/C received approximately three (3) telephone calls from HOWARD confirming that he was on his way (approximately 1552, 1555 and 1601).
25. At 1607 hrs, the U/C observed HOWARD and an unknown male white (later identified by CPD Officers J. Lokai #2298 and M. Paul #2246 as Brian SANDERS, a known associate of HOWARD) approaching the U/C vehicle. SANDERS entered the U/C vehicle from the passenger side and sat down. Once inside, SANDERS produced a large baggy containing a quantity of suspected crack cocaine. The U/C had SANDERS place the baggie on a scale to confirm the amount. The U/C then paid SANDERS five hundred dollars (\$500.00) in previously recorded government funds and HOWARD and SANDERS left the area on foot.
26. The suspected crack cocaine was transported to the CPD property room and turned in as evidence (property number: 06006007). The suspected crack cocaine was submitted to the CPD Crime Laboratory (log: 2379-06) for analysis and proved to be approximately 11.6 grams of cocaine base, commonly referred to as crack, a schedule II controlled substance.
27. On 23 March 2006, SRB Detective LaRoche #1034, working in an undercover capacity (U/C), proceeded to the area of Sullivant Avenue and Green Street, Columbus, Ohio to make a direct purchase of crack cocaine (known area utilized by Gregory Rasad HOWARD and his associates to traffic in illicit narcotics). Prior to traveling to the target area, the U/C made contact with HOWARD via cellular telephone and discussed purchasing 1/2 ounce of crack cocaine for \$500.00. HOWARD stated that he would be able to complete the deal for 1/2 ounce of crack cocaine and instructed the U/C to meet him at Sally's Market located at Sullivant Avenue and Green Street.
28. The U/C arrived at Sally's Market and immediately observed HOWARD. HOWARD entered the U/C vehicle from the passenger side and instructed the U/C to drive to the area of Rich Street, east of McDowell Street, Columbus, Ohio. The U/C drove to the area and observed HOWARD walk into an apartment at 445 Rich Street, Columbus, Ohio (located in the Riverside Bradley housing complex).
29. The U/C waited for approximately 5-6 minutes before observing HOWARD exit the apartment. HOWARD then entered the vehicle from the passenger side and produced a large baggy of suspected crack cocaine. HOWARD asked the U/C to drive him to the rear of 741 Sullivant Avenue, Columbus, Ohio.
30. Once at the location, HOWARD took the U/C's scales and entered the residence. A short time later, HOWARD returned with the suspected crack cocaine and the scales. The U/C re-weighed the suspected crack cocaine, which weighed 13 grams instead of 14 grams. The U/C informed HOWARD of the discrepancy and told HOWARD to call his supplier and tell him or her that the weight was short by one (1) gram. HOWARD agreed to do this and did call his supplier. While on the cellular telephone, the U/C told HOWARD to inform his supplier that he would pay \$460.00 and no more for the suspected crack cocaine. HOWARD's supplier agreed to the price and the U/C provided HOWARD with four hundred and sixty dollars (\$460.00) previously recorded government funds and HOWARD supplied the

U/C with the baggie containing the suspected crack cocaine. Following the transaction, HOWARD left the area on foot and was observed entering 741 Sullivant Avenue, Columbus, Ohio.

31. The suspected crack cocaine was transported to the CPD property room and turned in as evidence (property number: 06007098). The suspected crack cocaine was submitted to the CPD Crime Laboratory (log: 2758-06) for analysis and proved positive for approximately 11.4 grams of cocaine base, commonly referred to as crack, a schedule II controlled substance.
32. On March 28, 2006, SRB Detective LaRoche #1034, working in an undercover capacity (U/C), made arrangements via cellular telephone with HOWARD to purchase one (1) ounce of crack cocaine for \$1,000.00 and a firearm and to meet HOWARD's supplier. HOWARD instructed the U/C to meet him in the rear of 741 Sullivant Avenue, Columbus, Ohio (known residence utilized by Gregory Rasad HOWARD and his associates to traffic in illicit narcotics) to conduct the transaction and to meet HOWARD's supplier of crack cocaine.
33. The U/C arrived at the target area and observed HOWARD sitting on the back porch. HOWARD approached the U/C vehicle, opened the passenger side front door and sat down in the passenger front seat. The U/C asked HOWARD, "where's your boy at?" (referring to HOWARD's supplier). HOWARD replied, "he'll be here in a minute". HOWARD then asked the U/C if he would like to see the firearm. The U/C stated that the U/C would like to see the firearm. HOWARD then produced a .22 caliber Smith and Wesson model 22A pistol, bearing serial number: UAY4702.
34. HOWARD also produced a plastic baggie containing a large quantity of suspected crack cocaine and placed the crack on the U/C's digital scale. The U/C, being satisfied with the weight of the suspected crack cocaine and the firearm, paid HOWARD twelve hundred dollars (\$1,200.00) in previously recorded U.S. government funds (\$200.00 for the firearm and \$1,000.00 for the suspected crack cocaine). The U/C field tested the suspected crack cocaine and it tested positive for cocaine.
35. The suspected crack cocaine and firearm were transported to the CPD Property room and submitted as evidence (property# 06007527). The suspected crack cocaine and the firearm were submitted to the CPD Crime Laboratory for analysis. Analysis by Firearms Criminalist Mark J. Hardy determined that the firearm was inoperable due to an improperly positioned hammer. The suspected crack cocaine proved positive for approximately 26.2 grams of cocaine base, commonly referred to as crack, a schedule II controlled substance (Log# 2820-06).
36. On 12 April 2006, CPD Officers C. Radich #2249 and M. Paul #2246 were on routine patrol in marked CPD cruiser 88. The Officers were traveling w/b in the alleyway n/o Sullivant Avenue between Green Street and Davis Avenue, Columbus, Ohio (known area utilized by Gregory Rasad HOWARD and his associates to traffic in illicit narcotics). The Officers observed and immediately recognized HOWARD walking in the alleyway. The Officers know HOWARD to be a narcotics trafficker and have arrested HOWARD several times in the past for narcotics related offenses.
37. Upon observing the Officers approach, HOWARD threw an object to the ground with his left hand. Officers Radich and Paul observed this action and exited CPD cruiser 88 to investigate. Officer Radich went to the exact location where he had observed HOWARD throw the object and recovered a small plastic baggy containing a rock like substance. Officer Radich informed Officer Paul of his discovery and Officer Paul then placed HOWARD in custody and conducted a search incident to arrest.

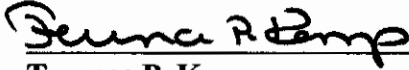


38. During this search, Officer Paul recovered a pill bottle which contained 20 unknown white pills in HOWARD's front right pants pocket. Officers Radich and Paul noted that the pill bottle's sticker was partially removed.
39. HOWARD was placed in the rear of CPD Cruiser 88 and read his constitutional rights by Officer Paul with Officer Radich as witness. HOWARD agreed waive those rights and answer questions without a lawyer present. During the course of questioning HOWARD initially stated that he did not drop anything, but eventually stated that, "I dropped the crack, but it was for the female that was walking with me".
40. The suspected crack cocaine and unknown white pills were transported to the CPD property room and turned in as evidence (property number: 06008778). The suspected crack cocaine and unknown white pills were submitted to the CPD Crime Laboratory (log: 3094-06). The suspected crack cocaine proved positive for .1 grams of cocaine, a schedule II controlled substance and the white unknown pills proved positive for 12.8 grams/20 unit doses of Hydrocodone and Acetaminophen, a schedule III controlled substance.
41. On April 13, 2006, SRB Detective LaRoche #1034, working in an undercover capacity (U/C) proceeded to the area of the Dodge Recreation Center located at 667 Sullivant Avenue to make a direct purchase of ½ ounce of crack cocaine from Gregory Rasad HOWARD for \$500.00 (known area utilized by Gregory Rasad HOWARD and his associates to traffic illicit narcotics). Prior to this transaction, the U/C expressed interest in meeting HOWARD's narcotics supplier. HOWARD had assured the U/C that he would have his supplier meet up with the U/C on this date.
42. As the U/C pulled onto the parking lot of the recreation center, he observed and immediately recognized HOWARD and an unknown male white (later identified by CPD Officer Anderson #1646 as Joshua Levi LEACH) standing near the entrance to the recreation center. The U/C parked the U/C vehicle and HOWARD and LEACH approached on foot. HOWARD stood by the driver's side of the vehicle while LEACH entered on the passenger side. While seated, LEACH stated, "got you a half ounce" and produced a large baggy of suspected crack cocaine from his left front pants pocket. The U/C placed the baggy on a digital scale and observed a weight of 14.8 grams.
43. The U/C paid LEACH five hundred dollars (\$500.00) in previously recorded government funds. At the completion of the transaction, HOWARD and LEACH left the area on foot while as the U/C departed the area.
44. The suspected crack cocaine was transported to the CPD property room and turned in as evidence (property number: 06008845). The suspected crack cocaine was submitted to the CPD Crime Laboratory (log: 3095-06) for analysis and proved positive for approximately 13.4 grams of cocaine base, commonly referred to as crack, a schedule II controlled substance.
45. Based on your affiant's training and experience in dealing with armed narcotics traffickers, your affiant believes there is probable cause to believe that starting on or about February 1, 2006 and continuing up to and including April 13, 2006, Gregory R. HOWARD, John A. LANOY, Joshua L. LEACH and Brian L. SANDERS did possess and did conspire to possess with intent to distribute cocaine base, commonly referred to as crack, a schedule II controlled substance (to wit: approximately 70.2 grams of crack cocaine).



Timothy P. Burt  
Special Agent, ATF

Sworn to and subscribed before me this 27<sup>th</sup> September 2006  
day of \_\_\_\_\_, \_\_\_\_\_, at Columbus, Ohio.



Terence P. Kemp  
U.S. MAGISTRATE JUDGE